

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re FOREST LABORATORIES, INC. : x Civil Action No. 05-CV-2827-RMB
SECURITIES LITIGATION :
: **ELECTRONICALLY FILED**
This Document Relates To: :
: **CLASS ACTION**
: x
ALL ACTIONS.

DECLARATION OF DALE HARRISON IN SUPPORT OF MOTION FOR CLASS
CERTIFICATION

I, DALE HARRISON, declare as follows:

1. I respectfully submit this declaration in support of the motion of PACE Industry Union Management Pension Fund (“PACE”), Teamster Affiliates Pension Plan (“the Plan”), and UNITE HERE Staff Retirement Fund (“UNITE HERE”) to have the above captioned action certified as a class action and to have PACE, the Plan, and UNITE HERE certified as class representatives. I have personal knowledge of the matters stated herein, and if called upon, could and would competently testify thereto.

2. I am Assistant Director of Investments, Pension Administration. The Plan was established in January 1962 and sponsored by the International Brotherhood of Teamsters, which was founded in 1903 and represents more than 1.4 million American and Canadian workers in more than 20 categories of trades and industries. The Plan is a defined benefit plan, governed by a board of trustees, and covers full-time employees of affiliates of the International Brotherhood of Teamsters. As of April 2007, The Plan had approximately 9,851 plan participants and over \$667.84 million in assets. During the Class Period, the Plan acquired 57,400 shares of Forest Laboratories, Inc. securities, and lost approximately \$379,435.33 as a result.

3. On September 15, 2005, this Court appointed PACE, the Plan, and UNITE HERE as the Lead Plaintiffs in this litigation and approved their choice of counsel. Since that time, the Plan has been actively involved in the prosecution of this case, reviewing draft and final pleadings as well as orders of this Court. The Plan has also reviewed the status of this action with counsel on at least a quarterly basis. The Plan has provided Rule 26 disclosures, responded to interrogatories, produced documents in response to document requests, and are willing to sit for depositions.

4. The Plan is committed to directing and reviewing the progress and status of the litigation as it proceeds to a trial. I have supervised and monitored the progress of the litigation and

have actively participated in its prosecution. It is my intention, on behalf of the Plan, to continue to monitor and participate in the ongoing prosecution of this action on behalf of all persons and entities who purchased or otherwise acquired the common stock of Forest Laboratories, Inc. during the period beginning August 15, 2002 through and including September 1, 2004. The Plan understands that, as a class representative, it will owe a fiduciary duty to all members of the proposed class to seek to obtain the largest recovery consistent with good faith advocacy.

5. If called upon to do so, I will appear to testify at a deposition and trial.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23 day of May, 2007, at New York, New York.

Dale Harrison

DALE HARRISON

S:\CasesSD\Forest Labs\DEC00042048_Teamsters_Class Cert.doc

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 24, 2007.

/s/ Matthew P. Montgomery
MATTHEW P. MONTGOMERY

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-3301
Telephone: 619/231-1058
619/231-7423 (fax)
E-mail:mattm@lerachlaw.com

Mailing Information for a Case 1:05-cv-02827-RMB-DCF

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Jonathan Watson Cuneo**
jorc@cuneolaw.com
- **Gary W. Kubek**
gwkubek@debevoise.com
- **Sharon Maine Lee**
slee@lchb.com
- **Harris Lee Pogust**
hpogust@cpm-law.com
- **Samuel Howard Rudman**
srudman@lerachlaw.com,e_file_ny@lerachlaw.com
- **Evan J Smith**
esmith@brodsky-smith.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

William S. Lerach
Milberg, Weiss, Bershad, Hynes and Lerach
401 B Street
San Diego, CA 92101

Darren J. Robbins
Milberg, Weiss, Bershad, Hynes & Lerach, L.L.P.
401 B Street
Suite 1600
San Diego, CA 92101